

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**JAMES M. PLASSE,**

**Plaintiff,**

**vs.**

**Civil Action No. 04-CV-30056-MAP**

**TYCO ELECTRONICS  
CORPORATION,**

**Defendant.**

**AFFIDAVIT OF LYNELLE J. SLIVINSKI**

I, Lynelle J. Slivinski, depose and state as follows:

1. I am counsel for Defendant Tyco Electronics Corporation ("TEC") in the above-captioned litigation. I was admitted to appear in this matter pro hac vice pursuant to Local Rule 83.5.3(b). This Affidavit is offered in support of TEC's Application for Attorneys' Fees and Costs made in connection with the Court's September 7, 2006 Memorandum and Order Allowing TEC's Motion to Dismiss and For Sanctions.

2. I am an associate with the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., in Morristown, New Jersey. Ogletree Deakins is a national labor and employment law firm with approximately 325 attorneys and offices in 25 cities throughout the United States. Ogletree Deakins' practice is limited to the representation of management in labor, employment, employee benefits and immigration law matters.

3. I am admitted to practice law in New Jersey, the United States District Court for the District of New Jersey, New York, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern

District of New York. I have also been admitted to practice pro hac vice in several other courts on the East Coast.

4. I am a graduate of Rutgers College and Rutgers School of Business (1996) and Seton Hall University School of Law (1999). After a one-year judicial clerkship with the New Jersey Superior Court (1999-2000), my practice has been almost exclusively limited to the representation of management in employment and labor matters.

5. Over the past six years, I have represented employers in numerous employment litigations, including discrimination, retaliation, whistleblower, wrongful termination and other related suits in state and federal courts and before administrative agencies in New Jersey, New York, Pennsylvania, Connecticut, Massachusetts, and California. I have performed the full range of litigation activities, including discovery, motion practice, trial preparation, and appellate practice.

6. I have been recognized as a 2006 New Jersey Super Lawyers – Rising Star for employment law.

7. My current (2006) standard rate for new matters is \$275 per hour.  
Signed under the pains and penalties of perjury.

DATED: September 27, 2006

  
Lynelle J. Slivinski

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